manipulation/management of data will be restricted to designated individuals by resource type. Complete details on the NANP Administration data management system are provided in Section 9.2 of this proposal.

The following information and reporting mechanisms will be established:

- A NANPA Web Site will be created and maintained. It will contain the following Non-Dialable Toll Point central office code related information:
  - A listing of assigned Non-Dialable Toll Point central office codes, with identification of the carrier to which the NXX code is assigned.
  - Information relevant to Non-Dialable Toll Point central office code replacement activities. NOTE: All information available from the NANPA Web Site will also be available from NANPA in paper form.
- Periodic reports of the status of Non-Dialable Toll Point central office resources will be provided to industry committees (e.g., INC).
- Publish Non-Dialable Toll Point central office code assignment details in the LERG.

F. Other Considerations/Impacts

None. ■

4.2.13 Additional NANPA Functional Requirements

Mitretek will fully comply with this requirement.

The NANP Administration is, and will continue to be, a clearing house for dealing with the numbering/addressing needs and aspirations of the North American telecommunications industry and its users. As such, NANPA will be the natural and appropriate point of contact for clients seeking numbering resources for new and innovative applications. NANPA must be capable of reacting to such inquiries in a professional, timely and constructive manner. In dealing with such requests, one of the following outcomes would be anticipated:

- It is not appropriate to use NANP resources - other numbering/addressing resources apply (e.g., X.121).
- It is not appropriate to use NANP resources - no alternative provided - appeal to industry, media, or regulator anticipated.
- An existing resource is appropriate - Industry Guidelines provide for it - resource assigned.
- An existing resource seems appropriate, however, Industry Guidelines do not provide for it - approach INC for resolution (i.e., INC Issue Statement).
- The request appears valid, however no existing NANP resource allocations seem to apply - approach INC for allocation of new resource and development of Assignment Guidelines (i.e., INC Issue Statement).

NANP Number Resource Assignment and Administration

All requests for "new" NANP numbering resource must ultimately be referred to an appropriate industry committee or regulatory body. The management of requests for new numbering resources is included in the overall NANP Administration responsibility, therefore no specific workload estimate is provided.

Additions and design changes to the North American Numbering Plan and its procedures are affected by industry consensus. Appropriate industry fora generally address the issue in question. In the new NANPA, Mitretek will refer to the NANC numbering issues not under the purview of a specific single forum or not resolved by such a forum.

Additions and design changes to the NANP not achieving consensus will be referred to the appropriate regulatory body including a NANPA position or recommendation if directed to do so by the NANC. The Mitretek NANPA will provide study, research and make recommendations for the inclusion of new requirements in the NANP and for their administration in the NANPA.

The Mitretek NANP Administration will be adaptable to emerging new services, architectures, and technologies. We will be flexible in accommodating new resource challenges and willing to commit resources to assist in developing Guidelines to serve new services. We can adapt to new conditions. Mitretek will find a way to successfully

administer whatever NANP resources may evolve. We will meet the needs of users and providers of telecommunications services in the area served by the NANP.

Mitretek's solution is adaptable and expandable to cover a broad range of assignment requirements. The system described in section 9.2 will be built for ease of adaptability for new functionality. Mitretek NANPA personnel are and will continue to be fully versed in the creation, adaptation, and application of new numbering assignment guidelines. They will be available as subject matter experts during the industry processes utilized in the creation of new numbering assignment guidelines. Subsequently, Mitretek will adapt to approved changes to numbering guidelines.

Mitretek will fully comply with regulatory directives consistent with the operating rules overseeing its NANPA ministerial function. Mitretek reserves the right to enter into dialog and to come to mutual agreement with its oversight entities to accommodate any substantive systems or staffing changes required by modification of guidelines, creation of guidelines, or by regulatory directives.

Mitretek and its predecessor, The MITRE Corporation, have been a long standing participants in the standardization of communications and communications support systems. They have been regularly involved in the research and creation of many telecommunications and technical standards and guidelines. Mitretek has been a regular

contributor to the clients standardization efforts. Regularly, documents supplied by the Mitretek sponsors to standards organizations have included contributions from Mitretek, or its predecessor, acting in a ministerial/advisory capacity.

Mitretek is regularly called upon to act as a facilitator between the government and industry to work on technical details of evolving systems. Mitretek also regularly facilitates gatherings of top sponsor personnel to assist in planning future systems, technology deployment efforts, and technical strategic planning. ■

4.3 NANP Administration Functional Requirements/NANP Transition Plan

Requirement: How new NANPA will transition and incorporate current NANP functions into its organization.

Mitretek's Transition Plan describes a seamless transition of NANP Administration functions and details how current NANP functions will transition and be incorporated into new NANPA and its organization. An initial meeting with the incumbent (Bellcore) to firm up specific dates for all activities will be held, after which the final NANP Transition Plan will be provided to the NANC. A detailed description of the primary elements of the transition plan follows.

Our Plan includes identification of Mitretek's administrative, management, and operations support staff and their supporting organizations, identification of a Transition Team; a description of the Transition Plan's principal elements; and a schedule for its implementation and completion.

Our detailed Transition Plan addresses Staffing, Information Systems, Facilities, Communications Systems, Training, Disaster Recovery, and Transition Evaluation and Cutover elements. Details of each are provided in the following paragraphs supported by scheduled activities as illustrated in the Gantt chart in Appendix O.

Mitretek NANP Administration Director, [redacted], will oversee the execution of the Transition Plan. In addition, an Administrative Management Resource Team for NANPA Transition will be made available from support organizations throughout Mitretek. These highly competent and experienced resources within Mitretek will serve to support the Transition Team when additional resources and expertise is required to ensure that schedules are met or requirements are satisfied in accomplishing the transition. The administrative support organizations include personnel from Mitretek's Corporate Information Management Division headed by [redacted], our Technical Resource Center headed by [redacted], Vice President, our Office of Human Resources (includes training support when required) headed by [redacted], Director, and our Corporate Security and Facilities Operations Division, headed by [redacted], Director. This administrative support team will ensure sufficient personal and technical resources are available to affect a successful transition within the proposed schedule meeting all deadlines.

The NANPA Transition Team will be headed by [redacted] and report to [redacted]. The Team will work with the incumbent along with key members of the new Mitretek NANP Administration staff. Transition Team members will include personnel from the Group One committed staff category identified in Section 3.1.

The final detailed project plan will be developed with the incumbent immediately upon notice of award. A plan that all parties agree to is the foundation for a successful transition of NANPA from Bellcore to Mitretek. Within the first 15 days, Mitretek will meet with Bellcore to complete identification of critical stages, timeframes, and activities for the entire transition. Formal inter-company communications will be established. When fully formulated, Mitretek will file the Transition Plan with the NANC and upon approval will commence activities not already underway.

Responsibilities of Bellcore and Mitretek will be jointly defined. Mitretek will establish specific project responsibilities for Mitretek and Bellcore and we will provide status reports throughout the transition to the NANC. The overall implementation plan will occur over 90 days as described in the Requirements Document.

The first 30 days will be a "learning period" for the new NANPA. In-depth training will be conducted for staff on an as-needed basis at the Bellcore NANPA site to ensure full understanding of all NANPA functions. Assimilation of Mitretek Customer Service and quality standards will follow.

The second 30 days will see the Mitretek NANPA site fully developed and staffed and during this phase with a new unified systems database turned up within 45 days of the FCC Order. By the end of this period, the full conveyance of all NANPA functions

including the most intense activities of NPA Code Administration and CIC Code Administration will occur.

During the final 30 day phase, the new Mitretek NANPA will be observed and evaluated. The Bellcore NANPA staff will remain available for consultation as necessary and will, together with Mitretek, review the transition with the NANC and evaluate the new NANPA's start-up performance.

In addition to the full development of each Plan element, Mitretek will perform critical supporting activities. All electronic and paper files made available from Bellcore will be transferred to the new NANPA. While Mitretek will develop new unified databases, copies of resident files at Bellcore will be available if needed. Further, we will review all federal, state, and other national regulatory activities in the area served potentially impacting NANPA operations.

Commencing with the new NANPA's management of VSCs, N11, and other non-intensive resources through the complete transition of NPA and CIC assignments to the end of the 90 day formal transition, Mitretek will assist the NANC in its evaluation of the New NANPA. The institution of processes facilitating NANPA user feedback will assist in this process. Mitretek's customer centered approach requires continual monitoring of its operations for quality and responsiveness. It is essential to Mitretek that the NANC and

industry users of NANPA services are satisfied and confident that the entrusting of these vital services in Mitretek is successful. Many NANPA transition activities will begin to establish the underpinnings of the new COCA operation.

Staffing

The Staffing element of the Plan serves as a guide to ensure that the qualifications and size of the NANPA staff, as well as the timing of its hiring, corresponds with the requirements of the Transition Plan and NANPA operations.

Mitretek began its recruiting activities throughout the telecommunications industry in the area served by NANPA in March, 1997. Extensive research was conducted identifying nearly 100 numbering professionals. Many indicated strong interest and availability following award. Mitretek will step up its recruiting activities immediately upon award notification. In addition, an internal search was conducted inside Mitretek to identify appropriate support personnel resources.

Mitretek recognizes that NANPA operations are highly specialized. We are committed to the placement of the best available numbering professionals in the industry in the new NANPA.

Offers of employment and subsequent hiring of NANPA personnel will represent critical benchmarks in the entire transition process. Personnel will be recruited from all segments of the industry. Indeed, Mitretek already has obtained the commitment of selected personnel resources through extensions of employment offers to be effective upon Mitretek's selection as the new NANPA.

So as to meet the 90 day formal transition period from the incumbent to the new NANPA, and with an eye toward having the best qualified staff on board and trained prior to the commencement of the final 30 day demonstration period, staffing activities are continuing prior to the start of the formal Transition Plan.

Information Systems

The Information Systems element encompasses the design, development, testing, and turn-up of information systems proposed by Mitretek to provide unified state-of-the-art support systems for an efficient NANPA operation.

The various databases and systems employed by the current NANPA will be transitioned into the New NANP Resource Database being proposed by Mitretek. The resource databases will be implemented in Microsoft SQL Server. The data modeling necessary to specify the SQL Server database fields will be initiated immediately upon selection of the NANPA.

Conversion of the data and loading of the data from the incumbent systems will occur next, in parallel with development of the graphical user interfaces needed to query and input the data. The systems will be fully operational at the end of the 60 day period when the new NANPA takes over full operation of the functions.

The NANPA Web Site, specified more fully in Section 9.2, will also be developed and put on line for NANPA reporting requirements at the end of the 60 day period. The first phase will support manual updating of all the required information onto the Web pages. Development will continue with the final goal of automating the updating of information through direct integration of the database and the Web site.

All systems will be accessible from the NANPA LAN to all workstations in the NANPA central facility in McLean and remotely to all regional offices.

The Plan schedules the requirements definition phase, software development, Bellcore data transfer and database build, testing, and system turn-up activities occurring within 60 days of the FCC Order naming the new NANPA. Upon completion, NANPA staff will have a vital resource enabling timely execution of resource requests, production of reports and documentation, and electronic conveyance of data to the industry and regulators on a real-time basis.

Workstations in all NANPA offices will be equipped with off-the-shelf software to accommodate administrative support activities. The Plan provides for sufficient time for training all staff in systems access and utilization.

Facilities

The Facilities element encompasses all the steps necessary to establish the NANPA at Mitretek's McLean facilities. Mitretek's security infrastructure and its planned communications systems exceed the requirements of this Requirements Document.

The Plan addresses the following:

- Space design
- Power requirements
- Cabling requirements
- Security requirements
- Demolition/Construction
- Schedule

Construction will begin immediately upon the issuance of the FCC Order naming the new NANPA to ensure site readiness. Construction will be coordinated to coincide with the installation of voice and data communications systems and the LAN. The entire facility

will be completed in sufficient time to allow for testing, start-up operations, and eventual certification.

The Communications Systems Plan

The Communications Systems element includes the voice and data systems required to satisfy the operational needs of the new NANPA. The needs of the NANPA/COCA regional offices are included in the implementation of communications systems in the central NANPA office.

The following operational assessments will guide Mitretek in the sizing and installation of its voice communications features:

- Current and projected call volume
- Speed of NANPA staff answering calls, e.g., within three rings
- Average staff holding and call handling times
- Hours of operation
- Abandon call rate
- Telecommunications features will include installation of voice mail at the start of the Transition, visual call waiting, capability to route calls to employee's homes during off hours, three-way calling, and call transfer.

Data services will be designed for direct line interfaces with the NANPA databases by remote offices. Requirements for connectivity to the NANPA LAN, personal computer modems, and printers are addressed.

Training

Mitretek training will be conducted by persons intimately familiar with current NANPA operations. Further, it is Mitretek's intention to staff the new NANPA with numbering professionals possessing a deep knowledge and understanding of industry guidelines and NANPA procedures.

The Training element includes the acquisition of vital documentation from the Bellcore NANPA to be integrated with training including guidelines and number resource descriptions and statuses. A needs assessment will be conducted with each individual included in the NANPA staff and appropriate training will be provided.

During the initial 30 day period following award, on-site observations will be made by Mitretek staff at Bellcore to teach or reinforce understanding of NANPA procedures. At the Mitretek NANPA site, training also will be provided covering security, LAN operations, and administrative procedures.

In addition, a "train-the-trainer" assessment and training will occur to prepare for implementation of the Mitretek NANPA training program for industry resource users.

Disaster Recovery

The Disaster Recovery element provides a blueprint for the provision of comparable NANPA services in an alternate site in the event the permanent facility is disabled for whatever reason and for whatever amount of time. Our systems and archival paper resources will be preserved off-site.

Mitretek maintains a highly developed sophisticated Disaster Recovery Plan for all of its operations. NANPA operations will be subsumed into the overall Mitretek Plan thereby ensuring a true state-of-the-art program for optimum data security and operations maintenance in the event of disaster. The Plan includes the following:

- Communications line outages
- LAN failure
- Power failure
- Fire, flooding, and natural disaster
- Anticipated effect on service
- Notification and evaluation procedures
- Alternative procedures

- Status reporting procedures
- "Normal" service restoration procedures
- Post crisis evaluation

The Disaster Recovery Plan provides a blueprint for the provision of comparable NANP Administration services at an alternate site in the event the permanent facility is disabled for whatever reason.

A detailed description of Mitretek's approach to disaster and service maintenance is provided in Section 9.3 of this document. A full explanation of the Disaster Recovery Plan will be provided the NANC upon request following notification of award.

Transition Evaluation and Cutover

The conclusion of the formal transition period will be marked by a full review of industry evaluation of new NANPA operations over the final 30 days of the transition. Mitretek will make final adjustments and modifications to its operations and will be prepared to assume full responsibility for all NANPA resources. All staff will be fully trained. The final Disaster Recovery Plan will be in place.

Following Cutover, Mitretek will file a complete report on the Transition including user evaluations with the NANC. ■

5.0 Central Office Code Administration

Introduction

This section provides a detailed description of how Mitretek will deliver the requirements associated with each of the five major functional categories associated with Central Office Code Administration and NPA Relief Planning. These functional categories have been described in the Requirements Document as:

1. General Client Services
2. Central Office Code Request Processing
3. Industry Notification Functions
4. NPA Relief Planning
5. Jeopardy NPA Process

Within each functional category, Mitretek will describe their contribution in the following format:

A. Function

B. Implementation

C. References

D. Products/Output

E. Organization/Staffing

F. Systems/Interface

Description of Resource

The NANP is based on a destination code principle where each telephone in the NANP has a specific address or destination code assigned to it. NANP numbers are in the following 10-digit format: NPA-NXX-XXXX (ABC-DEF-XXXX). The term central office code (CO code) or NXX refers to the sub-NPA destination code for addressing. Central Office Codes represent the D-E-F digits of the 10-digit NANP address and are specific to distinct geographic area codes (NPAs). For assignment and routing purposes, the CO Code is normally associated with a specific geographic location within the NPA from which it is assigned is also used for billing purposes.

In the 10-digit NANP, geographic NPAs are currently assigned by the NANP Administrator, while CO Codes are assigned by the predominant local exchange carrier (LEC) within a specific geographic area. This function will be consolidated in the new NANPA. In their current roles as CO Code Administrators, the Incumbent Local Exchange Carriers (ILECs) assign CO codes to themselves, as well as competitive local exchange carriers. Carriers use these assigned CO codes to provide telephone numbers to their customers. The Code Administrators forecast the projected exhaust of their geographic NPAs and initiate exhaust relief planning activities when necessary. When performing the NPA Relief Planning Coordinator function, the Code Administrator facilitates local industry relief planning processes, submits NPA relief plans to state public utility commissions, and monitors the implementation of the final relief plan. Code

Administrators also perform data administration functions such as adding new assignments to the Routing Data Base System (RDBS) and Bellcore Rating Input Database System (BRIDS).

The guiding principles for NANP resource assignment identified in Section 4.2 of this document apply to all aspects of CO Code administration, regardless of who performs the role of the new NANPA.

Code Administrators apply published INC Guidelines in managing central office code resources. These Guidelines may be modified or updated, as required, by industry consensus in the INC. In some states, the local regulatory environment may impose additional code assignment or NPA relief activities on the Code Administrator. The INC/ICCF Guidelines relevant to the code administration/NPA relief planning functions are as follows:

1. Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)
2. NPA Code Relief Planning Guidelines (INC 94-1216-004)
3. Industry Notification of NPA Relief Activity Guidelines (ICCF 92-1127-006), Revised ICCF29, July 1993
4. NPA Allocation Plan and Assignment Guidelines (INC 96-0308--011) Revision April 19, 1996

5. Recommended Notification Procedures To Industry For Changes In Access Network Architecture (ICCF 92-0726-004), Revision 1, March 17, 1994

The INC has recently (January, 1997) completed a Final Draft of Guidelines entitled "NPA Code Relief Planning & Notification Guidelines." This document represents a consolidation of documents #2 and #3 mentioned above, and as of this writing, has not yet been submitted for the initial and final closure process at INC.

Administration of numbering resources is critical to the effective and reliable operation of telecommunications in the area served by the NANP. To assure continued and future reliability of the network, the FCC, on July 13, 1995, in their Report and Order (CC Docket No. 92-237) Administration of the North American Numbering Plan, established six federal policy objectives for numbering. Mitretek acknowledges the significance of all the policy objectives and stands fully committed to their implementation. The following objectives are particularly relevant to central office code administration and the inherent NPA relief planning functions:

- Administration of the plan must seek to facilitate entry into the communications marketplace by making numbering resources available on an efficient, timely basis to communications services providers.
- Administration of the NANP should not unduly favor or disadvantage any particular industry segment or group of consumers.

- Administration of the NANP and the dialing plan should give consumers easy access to the public switched telephone network.

The following sections provide the detailed descriptions of how Mitretek will deliver the requirements associated with the role of Central Office Code Administration and NPA Relief Planning as established in Section 5 of the February 1997 NANPA Requirements Document. ■

5.1 General Responsibilities

Requirement 1: Develop knowledge of local environments and relationship with local regulators

Mitretek will fully comply with this requirement.

A) Function

The Mitretek NANP Administration will be staffed with personnel who already have a knowledge of local environments, particularly in regional offices. However, Mitretek will take a proactive stance in gaining a deeper understanding of local environments, listening to the ideas of local regulators, and ensuring that local concerns are voiced and addressed in numbering fora. Mitretek will ensure that channels of communications are clear and opened early. In some states, regulators may impose additional code assignment or NPA relief activities on the Code Administrator. Mitretek believes that these additional requirements will be less onerous if local regulators are fully informed of impacts of their local decisions and the conditions across the entire North American Region. Successful CO code administration will not only require a close working relationship with local regulators but also considerable knowledge of local environments including topography, demographics, growth patterns, local dialing plans, etc. Mitretek will establish a more proximal presence for Central Office Code Administration and NPA Relief Planning functions through our five regional Code Administration/NPA Relief Planning sites. See Section 5.1D.

B) Implementation

Central Office codes will be assigned, allocated, and administered according to the terms and conditions defined in the most current version of the Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008) and the NPA Code Relief Planning Guidelines (INC 94-1216-004 Rev. 1). Any changes to the Guidelines resulting from industry consensus, regulatory action or statute will also be implemented.

Mitretek has a solid understanding of the requirements associated with the role of the Central Office Code Administrator and NPA Relief Planner and has the capabilities required to fulfill these roles under the provisions required of the new NANPA. Mitretek has been actively tracking the emergence of competition as part of a national program of local telecommunications services procurements under the General Services Administration's Metropolitan Area Acquisitions (MAAs). Mitretek has staff members with recent experience in regulatory evaluations in the most active of local regulatory environments, such as California, New York, Massachusetts, Illinois, Maryland, Georgia, and Florida.

In recognition of the importance of local/regional presence, Mitretek will establish five regional Mitretek Code Administration Centers (MCACs) in the U.S. These centers will preserve the existing local presence established by the incumbent CO Code Administrators and will foster relationship building with local carriers and state public utility commissions.

Each MCAC will be responsible for the assignment and administration of CO codes and relevant NPA relief planning for NPAs in each geographic area. The locations of the MCACs and the combination of states/NPAs where this activity will take place are identified in subsection D) Products/Output.

C) References

The INC/ICCF Guidelines relevant to Code Administration/NPA relief planning functions are as follows:

1. Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)
2. NPA Code Relief Planning Guidelines (INC 94-1216-004)
3. Industry Notification of NPA Relief Activity Guidelines (ICCF 92-1127-006), Revised ICCF29, July 1993
4. NPA Allocation Plan and Assignment Guidelines (INC 96-0308-011) Revision 19 April 1996
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The INC has recently (January, 1997) completed a Final Draft of Guidelines entitled "NPA Code Relief Planning & Notification Guidelines." This document represents a consolidation of documents #2 and #3 mentioned above, and has not yet gone through the initial and final closure process at INC.